

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS - SHERMAN DIVISION**

CHRISTOPHER YOON,
Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA, INC.
Defendant.

§
§
§
§
§
§
§

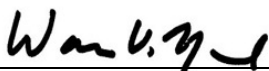
CIVIL ACTION NO.
4:24-CV-179-ALM

DECLARATION OF WARREN V. NORRED

My name is Warren V. Norred, and I declare under penalty of perjury under the laws of the United States of America that the following is true and correct.

1. I am an attorney and owner of Norred Law, PLLC and licensed to practice law in Texas.
2. I have been practicing law in the DFW area for over 16 years and I am familiar with reasonable pricing for legal services in the State of Texas.
3. I have previously testified regarding reasonable attorneys' fees in Texas, in multiple courts, and I have litigated in every federal court in Texas and every attached bankruptcy court.
4. I have also litigated in federal courts in California and Kansas, and in the Fifth and Ninth and Federal Courts of Appeal.
5. I have tried to verdict more than a dozen trials, the longest of which lasted ten (10) days, including jury deliberations.
6. Beyond jury trials, I have completed several dozen cases to judgment involving fees.
7. I was retained by Christopher Yoon to represent him in this dispute, and I have represented him throughout the discussion and litigation, filing all documents in this case.
8. Attached to this declaration as Exhibit B-1, a business record created in the normal course of business, which describes time and tasks performed on Yoon's behalf and attached as Exhibit B-2, the expenses associated.
9. As the affixed Exhibit B-1 and B-2 shows, my firm has spent over 73 hours on this case with attorney fees amounting to \$15,989.75 to date, and \$100 in expenses, totaling **\$16,089.75**. I expect to file a reply in support of this MSJ at another cost of three hours, and three hours for a hearing, for an additional \$2,700 in fees.

Executed in Tarrant County, State of Texas on February 7, 2025.



Warren V. Norred